U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES

TES IV
CONTRACT NO. 68-01-7351
WORK ASSIGNMENT NO. 33

FINAL REPORT
FOR
I.J. RECYCLING
FORT WAYNE, INDIANA

RECORDS COMPILATION
EPA REGION V

JACOBS ENGINEERING GROUP INC.
PROJECT NUMBER: 05-A005-33

PREPARED BY:
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JUNE 1989

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this project was to support EPA action in the cleanup of the I. J. Recycling Facility located at 3651 Clinton Street, in Fort Wayne, Indiana.

This report details the procedures required to complete what is being called "Phase II" of a records compilation project initiated under EPA Contract No. 68-01-7351, TES IV Work Assignment No. 33. These additional tasks were outlined in the work plan for Amendment No. 6 of the work assignment. The purpose of Phase II was to perform a 100% QA/QC of the original data base, compile a response data base, and revise the transaction and mailing data bases per any new data and response information in order to obtain a complete, up-to-date version of the site data bases.

1.2 Scope of Work

In an effort to obtain a completed data base, the EPA assigned additional tasks to be completed under this Work Assignment. The EPA sent 106 Administrative Orders and 104(e) Information Requests to identified PRPs from the existing data base. Some of the PRPs challenged EPA's procedures regarding the Freedom of Information Act (FOIA) requests. In order to comply with PRP requests and determine de minimus settlements, the EPA assigned the following tasks to Work Assignment No. 33:

- Compile a letter tracking data base of PRP responses including dates that letters were sent by EPA, dates the letters were received by the PRP, and the date the response letter was received from the PRP.
- Provide FOIA response support.
- Update the mailing address system with current addresses obtained from the responses.
- Add new transactions from the response data to the existing data base.
- Prepare a completed data base and final report.

This report summarizes the procedures, guidelines and assumptions which were followed in completing this scope of work.

1.3 Background

The main I. J. Recycling facility is a 4.5 acre site known as the "Clinton Site". This site is located at 3651 Clinton Street in Fort Wayne, Indiana. The site operated in a primarily commercial area bordered by small businesses, a major shopping center and a nearby

residential area. The site includes three main buildings, a fire house, two pump houses, and a tank farm. The facility specialized in treatment and reclamation of waste using methods such as oil/water separation, acid/base neutralization, heavy metal precipitation, water clarification and chemical fixation.

Prior to hazardous waste management activities, the facility was operated as a dairy processing plant by Milk Marketing Inc. The facility was purchased by Anthony Home Service and Building Maintenance, Inc. on February 14, 1980 based on Corporate Deed No. 80-06658. Anthony Home Service operated at 537 Southview Avenue in Fort Wayne providing home and residential cleaning services, fire and water damage restoration, and a limited industrial waste management service.

Hanchar Industrial Waste Management Inc. (HIWM) was then formed as an affiliated business to provide commercial hazardous waste management at the Clinton Street location. This firm was then reorganized by Mr. Anthony A. Hanchar into Continental Waste Service Inc. (CWSI) which operated the site from approximately January 11, 1983 through January 9, 1985. In an interim period the plant was operated under the name Chemical Resource Recovery Inc. (CRRI) (approximately June 1982 through December 1982). Chem-Resources Recovery Inc. was operated by: Chem-Security Systems, Inc. (CSSI), P.O. Box 1866, Bellevue, WA 98009, phone (206) 827-0711.

During the CSSI period of operation, a lease agreement with Aqua-Tech Inc. allowed it to manage waste on part of the facility. The I. Jones Partnership then bought the facility from Continental Waste Service Inc. on August 1, 1985, and operated the site as I. Jones Recycling for approximately one year until a chemical fire occurred on September 9, 1986.

After the fire, the city and state Department of Environmental Management initiated action to close the plant. The U. S. Environmental Protection Agency (EPA) through Region V offices then became involved in the action. According to a site inspection conducted September 23, 1986, by the EPA On-Scene Coordinator (OSC) and a Technical Assistance Team (TAT), an estimated 2700 drums, 21 storage tanks, and 6 tankers were located in and around buildings at the facility. Of the 2700 drums, approximately 86 were leaking. The overall condition of the facility made it apparent to the OSC that the facility had lost its ability to manage, treat, and dispose of the hazardous materials on site.

The site assessment determined that the facility posed an imminent and substantial endangerment to public health or welfare or environment. The most dangerous threat posed by the situation at the I. J. Recycling facility was the potential for incompatible materials to combine resulting in a fire and/or explosion. A fire could potentially emit hazardous materials and toxic gases into the air which could result in injury or death. Another serious threat was the potential for contamination of drinking water and/or other sensitive ecosystems

An Administrative Order requiring a cleanup of the site was issued October 14, 1986 to the various partners of I. J. Recycling. None of the parties complied with the request. So, in an effort to improve the hazardous conditions at the site, the EPA initiated an emergency removal activity on November 3, 1986. The action included characterizing and stabilizing waste in the 2700 drums, roll-offs, bulk tanker trailers, two large upright tanks and various small tanks in the buildings. Removal activity was limited to a small volume

of acutely toxic waste. Phase I of this emergency removal was completed on December 1, 1986.

After 10 months, the steadily deteriorating condition of the facility exhibited the need for further action at the site. A second Administrative Order was issued to the partners of I.J. Recycling on September 9, 1987. Again, the partners did not comply with the order, which stipulated additional cleanup activities. As indicated in an October 21, 1987 Polrep, a second removal, performed by EPA, commenced on October 19, 1987. It involved the sampling, transportation and disposal of hazardous liquids stored in over 3000 drums, 60 tanks, 3 tankers, and 4 underground tanks at the facility.

The second removal action was halted the last week in December of 1987. It did not recommence until March 22, 1988, after an approval to waive the statutory $2,000,000 limit on removal actions. According to a Memorandum dated March 21, 1988, this waiver was approved on March 17, 1988. Continuation of this action was to include the disposal of 700 drums, 6 roll off boxes and 3000 gallons of contaminated waste water. This action was completed November 23, 1988.

During the first phase of this records compilation, approximately 300 PRPs were discovered. These PRPs were sent an Administrative Order on July 27, 1988 to complete the remaining work needed at the site. According to the site attorney for EPA Region V, Tom Krueger, a Work Plan was submitted by a group of approximately 100 PRPs known as the Clinton Street Group. After its approval on November 23, 1988 the PRPs began cleanup activities on November 27, 1988. These activities are expected to be completed in June 1989.

A closely related site referred to as the "Covington Road" site was used as a temporary staging area for drums before treatment or disposal at the Clinton site or before shipment to alternate sites for disposal. This site was included in all purchases and changes of ownership, although CRRI and the I. Jones Partnership never operated the site. Operations at the site discontinued in 1982.

At the present time, 8 drums and a pile of contaminated dirt remain on the Covington Road site. Actions are being taken in order to remove this material from the site according to a conversation with the site attorney on May 12, 1989. A unilateral order is being drafted for sampling to be performed at the site. Soil samples will be taken and if contamination exists, the ground water will also be tested. Offsite soil will also be sampled to determine the extent of contamination. There is indication that a creek near the site may have spread contamination from weakened drums which may be leaking.

1.4 Overview of Previous Tasks

Tasks outlined for the original phase of this project were completed in March of 1987 and involved four general phases of work.

These were to:

1. Review and copy relevant site records.

2. Determine past and present ownership and initiate title search activities at the site.

3. Identify potentially responsible parties (PRPs).

4. Compile a computerized data base to include types of waste accepted by the site, waste volume, value of transactions and rank of PRPs in terms of volume and value of transactions occurring at the site.

1.4.1 Title search

As indicated in the March 1987 draft report for I. J. Recycling, the current owner of the Clinton and Covington sites is:

I. Jones Partnership
835 North Ridgeland
Oak Park, IL 60302

A recent title search indicated that ownership of the sites has not changed in the past two years. For a complete summary of title search activities refer to pages 4-13 of the March 1987 draft report.

1.4.2 Compilation procedures

Copying of the site records began November 19, 1986, and all pertinent files were copied by November 25, 1986. Approximately 35,000 pages of documents were sent to the TES IV contractor's office on November 26, 1986.

On December 1, 1986, the contractor started developing a list of PRPs, first by extracting a list of unique generator names from the company ledgers listing waste transactions. These ledgers included generators from 1980 to the cease of operations in 1986 after a fire. Generators prior to 1980 were extracted from pre-1980 manifests.

Once a list of names was compiled, addresses were taken from the most recent documents. Known division and corporate headquarter addresses, other than those obtained from the documents were added to the data base. Subsequent activities included verification of these addresses using current telephone directories and telephone calls to Departments of State or Commerce.

A transactional data base was compiled using dBase III software. Simple file structures were set up containing the information specified in the work assignment. In January 1987, PRPBASE (Potentially Responsible Party Data Base System) was provided by the EPA. The existing files for the list of PRPs, addresses, and transactions had to be converted to this system. Data entry and editing were delayed due to the trial and error learning process and multiple data entry screens involved with the new program. There were also difficulties resulting from programming updates which contained errors, causing further delays.

1.4.3 Phase I guidelines

Guidelines followed during the first phase of the compilation procedures were to:

- Exclude transactions involving product sales, laboratory sampling, transportation of waste to other sites, pumping and intra-company waste inventory adjustments (i.e. pulled from storage (PFS) transactions).
- Include all waste shipments to the Clinton or Covington Road sites.
- Enter the code "ON" in the disposal method field for waste disposed of at the Clinton site and enter the code "CO" in the disposal method field for waste which was disposed of at the Covington Road site.
- Enter a blank in the disposal method field of a transaction if the disposal site was HIWM, but the location was not specified (Clinton or Covington). Later, when separating the Clinton and Covington transactions, records with a blank disposal methods were included in the Clinton data base.
- Include wastes such as empty drums, boxes, dirt, broken pallets, clabberstock and empty boxes. In most cases, a unit conversion was not available, resulting in a 0 (zero) quantity, but it was assumed that such wastes could be contaminated.
- Enter transactions per manifest line item description. This sometimes resulted in as many as 20 transactions for a single manifest. Costs were matched to the extent possible to each line item transaction.
- Exclude transactions derived from invoices which were not accompanied by manifests and were not listed on the SPC-17 Hauler Report. The disposal site or company is not listed on the invoices, therefore, the assumption that the waste was disposed of at HIWM was not made.
- Enter alphabetical letters after the invoice number for transactions on an invoice pertaining to more than one transaction. This created a unique invoice number for each transaction.

1.4.4 Results of Phase I compilation

Reports generated in the original phase of work resulted in identifying 356 PRPs with transactions at the Clinton and Covington sites, 325 of these with transactions at the Clinton site. These 325 generators accounted for 4.8 million gallons of waste disposed at a cost of $1,530,000 for the period of mid-1979 to closure. The largest single generator was the General Electric facility on Taylor Street in Fort Wayne, Indiana.

At the Covington site, 94 generators (including some who also disposed of wastes at the Clinton site) disposed of 1.27 million gallons of waste at a cost of $437,000 for the period mid-1979 to closure. Container Corporation of America was the largest disposer with 162,000 gallons of waste. Separate reports were provided for Clinton and Covington sites.

2.0 SUMMARY OF WORK PERFORMED

After submittal of draft reports in March of 1987, another phase of this compilation project was initiated in September of 1988. In conjunction with providing final reports and compiling a response data base, additional activities, including a 100% Quality Assurance/Quality Check (QA/QC) were requested by the EPA Primary Contact.

- The contractor was instructed to perform a 100% QA/QC of the original data base and make applicable revisions. A major revision included merging all separate subsidiary or plant transactions into a single PRP (parent company). Specific Phase I guidance was to keep each facility separate.

- After the issuance of a 106 Administrative Order and 104(e) Information Request, the contractor was tasked to compile a response data base using the information received from the PRPs. Specific tasks were outlined in the Work Plan for Amendment No. 6.

- Other tasks were to maintain current data bases using the response data. These tasks included updating mailing addresses, incorporating new transactions, and clarifying corporate relationships.

- Upon completion of the above tasks, the contractor was to provide an updated version of all relevant reports.

2.1 100% Quality Assurance/Quality Check Process

The 100% QA/QC process involved checking a total of approximately 10,500 records. Of these, 5,672 records were waste transactions and 4,865 records were in the invoice subfile records, containing cost data for the waste transaction records.

2.1.1 Examination of data base and documents

- To begin the process, the original Waste Transaction Report No. 3 (known as the "dump" report) which lists cost and waste data by PRP, was visually checked against the individual PRP files. Documents in the files were primarily HIWM/CWSI/CSSI/CRRI/IJ manifests issued by operators of the facility, individual company manifests, and invoices issued by operators of the facility. These documents are supported by company ledgers of transactions and hauler reports (SPC-17s) sent to the State of Indiana.

- Although few errors were discovered in basic data entry or in assigning transactions to the proper parties, some difficulties were encountered. The most significant problem was the difficulty in matching documents with the data base report resulting from a combination of factors:

1. The documents can be extremely confusing. Often a given transaction is covered by documents to two or more parties including:

    * invoice to shipper
    * manifest by company to shipper
    * manifest by IJ operator to shipper
    * invoice to parent company

2. The manifests tend to have the same or similar dates but there can be a month or longer delay between manifest date and invoice date which means the related documents are chronologically separated in the files. Therefore, documents within an individual file were compared in order to avoid duplication of the same transaction from separate documents.

3. Data were originally entered using ledgers and sequential sets of manifests and invoices prior to filing of documents by PRP. This expedited data entry at a time of extreme deadlines and avoided double entry of transactions but made the PRP files less compatible with data base transactional reports.

4. The staff used to set up the data base was more experienced and qualified in matching transactions to the appropriate parties than were the clericals performing filing, sorting and stamping. Data entry personnel inspected individual documents carefully to assign transactions to the actual generator. In many cases, two or more parties were associated with one transaction. Filing clerks would tend to file documents by letterhead name or the first name on the document and would often overlook other names referenced in the document.

- To partially correct the sorting problem, the contractor created document control notes. The notes accompanied misfiled documents recording their removal or addition to a file. A yellow "removal note" was placed in the file from which documents were removed. This note recorded the document reference number, the destination file and PRP code, the date of removal, and explanation notes. A green "additions note" accompanied the documents, which were placed in the back of the receiving PRP file. An example of a removal and an additions note is provided in Appendix A.

- Stamping of the documents was also performed after data entry. Therefore, the "Bates" reference numbers were not available to enter at the time of data entry. So, in order to expedite the retrieval of documents and matching of transactions, the Bate's reference numbers were entered onto the QA/QC sheets and then into the reference number field of the transactional record during editing.

- Essentially, when checking the transactions, missing information was not recorded as an error, but incorrect information was considered an error. If a transaction date was missing, but there was a shipped and received date, the missing transaction date was not recorded as an error. Other information not recorded as an error were missing document types and missing unit prices.

2.1.2 Revisions to data base

Upon completion of the QA/QC process, the contractor entered changes from completed QA/QC sheets. The QA/QC sheets referenced the PRP, record number, and the change, deletion, or addition to be made.

Transactions which needed to be added to the data base as a result of the 100% QA/QC were coded using a Waste Transaction Data Coding Form (Appendix B). Data from these coding sheets was then added to the site transactions data base.

2.2 Compilation of Response Data

On July 27, 1988, the EPA sent 106 Administrative Orders requesting compliance by the PRPs identified as contributors to the I. J. Recycling Site. The EPA sent 104(e) Information Requests on October 12, 1988.

Some of the PRPs challenged EPA's procedures regarding Freedom of Information Act (FOIA) requests. In order to comply with PRP requests and determine de minimus settlements, additional tasks were needed. The EPA needed a completed data base to include new transactions from the response data and updated mailing addresses. These additional tasks are outlined in the Work Plan for Amendment No. 6. Some procedures may have been performed somewhat differently than outlined in the amendment; however, all procedures were approved by the Primary Contact.

2.2.1 Organization of response files

Upon receipt of the first response documents (primarily postal receipts, green certified mailing cards, and PRP responses), the contractor began sorting by PRP.

- First, each certified mail receipt and green card was stapled to a separate blank sheet of paper and filed by PRP. Although the amendment indicated these should be stapled to the PRP folders, the Primary Contact approved this procedure since it was performed prior to receipt of written guidance.

- All of the response documents were then placed in individual PRP folders and sorted chronologically within the file along with the mailing receipts. Since the documents were sorted chronologically, the Administrative Order information falls first in the file and the 104(e) Information Request data follows. The Primary Contact indicated it was not necessary to create a color coded filing system separating the 106 Administrative Order and the 104(e) Information Request as suggested in Amendment No. 6.

- File labels were placed on the PRP folders after completion of the updated mailing address data base. The labels include only the PRP code and PRP name.

2.2.2 Coding procedures and explanations

Once the response documents were organized into an alphabetical system, the contractor began coding information to be entered into the letter tracking data base of the PRPBASE program. The Primary Contact provided two lists of PRPs to be coded into the letter tracking system first. The contractor proceeded in the following manner.

- A list of approximately 30 PRPs (Appendix C) was provided to the contractor to be coded first and checked for liability issues. These PRPs were coded and entered into the letter tracking system using the PRPBASE letter tracking data coding form in Appendix D. A report summarizing their responses and the liability issues they raised was provided to the Primary Contact on December 9, 1988.

- The second list provided to the contractor included 55 PRPs (Appendix E) with FOIA requests. These PRP responses were reviewed to determine whether the FOIA information should be released. Adequacy of responses was determined under guidelines received by the Primary Contact. These were to:

  Release information if . . . PRP stated no involvement and included an affidavit supporting this statement
  OR
  PRP gave information about waste types and volumes.

  Do not release information if . . . . . PRP stated they are still checking
  OR
  PRP evaded waste types and volumes.

  The results of this review and determination of adequate responses were provided to the Primary Contact on December 21, 1988.

- Upon completion of the two lists, the contractor proceeded with coding of the remaining responses. Delays resulted because guidance for coding the letter tracking data were revised by EPA after some files were initially completed. Written guidelines received from the Primary Contact for entering data onto the coding sheets are provided in Appendix F. The files had to be reviewed a second time for liability issues, green cards which had not been dated (the date 3 days after the mailing date was to be recorded as the receipt date - these had previously been left blank), letters in which the PRP requested FOIA (a copy of each of these letters was to be provided to the Primary Contact), and adequate responses for the remaining PRPs with FOIA requests.

- Documents or responses marked or indicated "Confidential Business Information" (CBI) were returned to the Primary Contact. Such documents were not reviewed or included in the PRP response summary. For any PRP requesting CBI, a (Y)es was placed under the question "Has PRP requested CBI?" in the letter tracking response.

2.2.3 Data entry procedures & explanations

Response data was entered into the PRPBASE letter tracking data base from the completed data coding forms. Throughout this phase of work, the contractor performed continual updates to the coding sheets and data base. This was due to the periodic shipments of new material received from the Primary Contact.

2.2.4 Quality Assurance/Quality Checks (QA/QC)

As mentioned in Section 2.2.2, each response file was reviewed twice for letter tracking data. Therefore, a QA check of every 50th record was not performed, assuming errors would have been detected during the second review. Most files were reviewed a third time for mailing address data.

2.2.5 Summarization of liability issues

Reports summarizing the liability issues raised by the PRPs were provided on three different occasions. The first report covered issues raised by the 30 PRPs (listed in Appendix C) to be completed first. The second report summarized issues raised by the remaining PRPs and the third report covered documents received after submittal of the second report. These lists are provided in Appendix G.

The issue most frequently raised was that the PRPs do not believe their waste was hazardous and, thus did not contribute to the conditions at the site. Other issues were that the waste was sent to the site prior to a cleanup conducted by Chem-Security Systems (CSSI) in 1982 and no longer remains on site; the PRP did not select the facility; any release of hazardous substances is due to the act or omission of the site operators; the waste was assumed to have been disposed of properly; and the waste ultimately went to another site.

2.2.6 Freedom of Information Act (FOIA) support

As stated in Amendment No. 6 to the Work Assignment, the contractor provided FOIA response support in terms of the compilation of reports and copying requested documents.

- The first task required regarding FOIA support was the compilation of a report of 55 PRPs requesting FOIA information. This report summarized their responses and distinguished adequate responses under the guidelines presented in the "Coding Procedures and Explanations" section of this report (Section 2.2.2). This report was provided to the Primary Contact on December 21, 1988.

- A similar report was provided for the remaining PRPs requesting FOIA information on January 31, 1989. The guidelines stated previously were also used for this report.

- These reports were reviewed by the Primary Contact and a few changes were made as to whether to release the information or not, i.e. (N)o answers under the "Release FOIA" column were changed to (Y)es.

- *Upon receipt of these revisions, the contractor was instructed to begin* providing copies of the PRP site files starting with the PRPs with adequate responses [(Y)es under "Release FOIA"]. The first set of these FOIA requests was provided February 13, 1989. The contractor completed copying of FOIA requests for PRPs with inadequate responses [(N)o under "Release FOIA"] and sent these documents February 21, 1989.

- Due to size and effort involved in copying the General Electric site files, this FOIA request was provided separately. The contractor provided copies of all of the General Electric facility site files to the Primary Contact on February 22, 1989. A total of 3,844 documents were copied and provided in response to the General Electric FOIA request.

- A supplemental FOIA shipment was made on March 14, 1989. This shipment included requests phoned in by Tom Krueger, Office of Regional Counsel (ORC) attorney, and additional requests obtained from new responses.

2.3 Data Base Revisions and Additional Tasks

In addition to compiling a letter tracking data base, existing data bases had to be revised to reflect new information received in the response files. The contractor also supported the EPA by providing site information as needed and requested.

2.3.1 Update of mailing address data base

The original mailing address data base was completed by the contractor approximately two years ago and, thus required numerous revisions. Updated information was obtained from the response files.

- The original mailing data base was done in the first version of PRPBASE, which did not allow for multiple addresses for an individual PRP. Therefore, two addresses were often entered for one PRP using two unique PRP codes. Before entering new data from the responses into the mailing data base, the contractor had to determine which of the addresses were actually verified corporate addresses and which were facility addresses obtained from documents in the site files. This was done by referring to the "action" codes

originally entered in the lawfirm field of the mailing address record. These codes were:

R = PRP codes for whom there are documents showing on-site disposal, but lacking a verified address.

L = PRP codes for whom there are documents showing on-site disposal and for whom exists a verified address; or verified corporate addresses for PRPs coded "R".

- Addresses provided in the response files were compared with addresses in the existing data base for PRPs from which response data was received. When provided, the lawfirm or attorney address was entered as address type 1, or the primary address. The company address was maintained as address type 2, or the facility address. Changes were made to the company address whenever applicable.

- In reviewing PRP response files, it was discovered that some company names had changed since completion of the original database. In order to understand PRP relationships and document PRP changes in names, the original name appears in the PRP name field of the mailing address record. The new PRP name follows in the PRP name field, if space allowed. If not, the new name was placed in the lawfirm or address 1 field of the mailing address record.

- Several phases of checking and revising addresses were completed due to the continual receipt of new response documents and information obtained about company relationships. Due to continual updates and the importance of providing an accurate mailing data base for future mailings, the contractor performed a complete QA/QC of the mailing address data base. Revisions and additions were made as applicable.

- Prior to final submittal of the PRPBASE reports, the contractor received a list of PRPs and current addresses from the site ORC attorney, Tom Krueger, to be incorporated into the existing mailing address data base. This list was developed by the PRP steering committee. Upon approval from the Primary Contact, revisions to the data base were made per this list.

- Mailing labels for subsequent mailings were provided to the Primary Contact periodically throughout the course of the project. These labels were generated for the primary PRP addresses through the PRPBASE system.

2.3.2 Incorporation of new transactions

In addition to reviewing the response files for current addresses. The files were also reviewed for transactions not included in the existing transactional data base.

- Rather than inspect every response file for transactional data, a list of PRP responses which included attachments was generated from the letter tracking data base. Since verbal guidelines were to enter new transactions only from

actual transaction documents provided and not from responses mentioning volumes or dates, this list reduced the time involved in this task.

- In order to add only new transactions, thus not duplicating existing site transactions, the contractor compared the response data to the existing data. This was accomplished using a copy of Waste Transaction Report No. 3, which lists each individual transaction per PRP. Transactions provided in the response files were matched against this report and any new transactions were added to the data base.

- Rather than create a generator transaction file, the contractor was directed to add unique response transactions to the existing site transactional data base. This procedure eliminated the PRPBASE merging of the two files, which generally becomes a complex process due to the matching of transactions.

- Transactions from documents in several response files were not entered into the data base because the final destination is unknown. These documents exist in the response files for Essex (36,700 gallons), Uniroyal (10,000 gallons), R. R. Donnelley (60,940 gallons), and Rea Magnet Wire Co., Inc. (5000 gallons).

- Approximately 36 new transactions were added to the site data base as a result of the review of response documents. These transactions totalled 112,870 gallons of waste including solvents, acid, sodium hydroxide, rexolene, naptha, paint sludge, caustic materials, and various waste oils.

2.3.3 Merging of PRP files and transactions

Throughout the compilation of the original data base, guidelines were to keep individual companies, facilities, subsidiaries, and divisions separate. During the second phase of work, the contractor was to combine related facilities and treat them as one PRP.

- Many companies disposing at the site had multiple facilities, some from the same region, others in different states. The contractor combined these facilities when there was an obvious relationship between the two facilities, i.e. the same corporate address. For General Electric this phase of work reduced the number of facilities from nine facilities to one. Other companies for which facilities were combined include:

  Ashland Oil
  Bendix
  Central Soya
  Dana Corporation
  Essex
  Ford Motor Company
  Fruehauf
  General Motors Corporation
  General Telephone Electric (GTE)
  Hendrickson-Tandem
  Indiana & Michigan Electric

International Harvester
ITT
National Oil/Gasway
Starcraft
Sheller-Globe
Sturgis Iron & Metal/Michiana Solid Refuse
Switches
Tokheim Corporation

- When merging facilities and divisions, PRP codes were changed in all areas of the PRPBASE system. This included changes to the mailing address, letter tracking, site transactional, and invoice data bases.

- There were times when the relationship between two facilities or companies was not clear, so the contractor had to make a judgement decision on whether the two facilities should be combined. In most cases, if the connection was not clear, the companies were not combined.

- In order to maintain relationship to the appropriate facility, disposal method codes were created and entered in the transactional data base. These codes are three letter codes with the facility name and location in the description. These codes were entered into transactional records with a global command before the facility PRP code was changed to the universal code for that PRP. To illustrate, the PRP code "GEBROA" was the original PRP code used for the General Electric facility on Broadway Street in Fort Wayne, Indiana. A global command was issued to add the disposal method "GBR", whose description in the disposal methods data base is "General Electric-Broadway", to all transactions with the PRP code "GEBROA". Once this was completed, the PRP code "GEBROA" was replaced with the PRP code "GECORP", which is the universal PRP code for all of the General Electric facilities.

2.3.4 Additional tasks performed

In completing this compilation, periodic requests from the Primary Contact and ORC attorney were filled by the contractor.

- On February 15th and 16th, 1989, Mr. Tom Krueger, ORC attorney, visited the contractor's office. During the Mr. Krueger's visit, the contractor performed several requested tasks. The contractor made approximately 979 copies of the site and response files. The contractor spent approximately 15 hours during Mr. Krueger's visit copying, refiling, and assisting him with various tasks.

- Also, Mr. Krueger asked that the contractor provide him with a list of PRPs which did not receive the Administrative Order. This was done through the letter tracking data base by extracting all PRP names for which there was a blank PRP receipt date for the notification letter summary.

- Before his departure, Mr. Krueger left additional documents to be copied and a list of files to be checked for analytical data. The contractor carried out

these tasks and provided the copies and the results of the review of files to Mr. Krueger on March 10, 1989.

- On February 16, 1989, the contractor made and provided copies of green certified mail cards for some of the 104(e) Information Requests. The Primary Contact requested copies of the green cards for a list of PRPs which had not responded.

2.4 Preparation of Final Reports

The submittal of final reports was delayed due to the continual receipt of new response data, which had to be incorporated. Before generating reports, the PRPBASE validation routine was administered. This process is very time consuming and ties up computers for long periods of time (in excess of 12 hours). Delays resulted because the contractor reviewed PRP files to insure that all late response information had been incorporated into the data base in order to avoid unnecessary duplication of the validation process.

Since the submittal of Phase II computer reports, additional material has been received. This material has not been incorporated into the data bases as project budgets did not allow their inclusion and Agency cut-off dates were passed. The documents were place in files with a tracking note stating "due to delayed receipt, the following material and data are not entered in the letter tracking or transactional data bases." A separate list (data base) with the PRP name, date and type of document has been maintained to track which data have not been incorporated.

2.4.1 Validation of data

The validation process is a PRPBASE option which screens all of the data base files for invalid codes and duplicate records. In addition, it calculates dollar amounts per invoice number using the unit price field of the transaction record. This total is compared to the total invoice amount entered into the corresponding invoice record.

In order to save time at the point of original entry, the contractor entered cost data in the invoice files only. This eliminated the need to convert the total cost figure into a unit cost. As a result, the calculated costs were almost always 0 (zero). This created an error message during the validation process because the calculated cost and the invoice cost did not match. No other problems were encountered during the I. J. Recycling validation.

2.4.2 Separation of Clinton and Covington transactions

I. J. Recycling operated sites in Fort Wayne, Indiana, on Clinton Street and Covington Road. A third site was discovered during the 100% QA/QC. This site was called the HIWM Bostick Road Farm. No background information is available for this site. Transactions pertaining to this site were conducted during HIWM operation. The only shipments recorded going there were from the Container Corporation of American and totaled 27,800 gallons of activated sludge.

The PRPs involved in the Clinton and Covington Road sites are being treated separately in terms of cost recovery and clean-up. To maintain flexibility in terms of transactional documentation, the contractor is maintaining both combined and separate transactional data bases for the two sites. Thus far the EPA's main concern has been the Clinton Street site.

Prior to sending reports, the Clinton and Covington Road transactions were separated while maintaining the combined data base. This was done through dBase III plus commands which extracted transactions according to the disposal method ("ON" for Clinton and "CO" for Covington). For these transactions, the invoice records were separated by matching the invoice number to the appropriate transaction.

3.0 SUMMARY OF ASSUMPTIONS

During the 100% QA/QC process and the incorporation of the response data, the same assumptions were followed as during the first phase of work. These assumptions are summarized in Section 1.4.3 of this report.

4.0 CONVERSION METHODS USED

PRPBASE is supported by auxiliary files which contain data codes and their descriptions. These codes are used in the transactional, invoice, letter tracking, and mailing data bases to increase efficiency of the coding and data entry processes. The auxiliary files are linked to these data bases and perform translation of these codes when generating PRPBASE reports. Auxiliary files exist for waste descriptions, transporters, disposal methods, document types, and unit conversions.

4.1 Waste Descriptions

PRPBASE contains waste codes and descriptions for over 300 types of waste. Throughout this compilation, when a waste type was not found in the existing PRPBASE waste description codes, a new code and description was entered into the waste description auxiliary file. After the addition of new codes and descriptions, the waste description file contains 496 different types of waste.

4.2 Transporters

Eighty (80) transporters were identified in the transactional documents for this site, including each of the individual operators of the site.

4.3 Disposal Methods

Although generally used to translate methods of disposal for waste, the disposal method auxiliary file was used to track other characteristics of a transaction as well.

- The disposal method field was used to indicate which of the I. J. Recycling sites were used for disposal: the Clinton site (ON), the Covington site (CO), or the Bostick Road Farm site (BR).

- As summarized in Section 2.3.3 of this report, the disposal method field of the transactional record was also used in tracking the original waste generating facility of a company. Three-letter codes were entered and keyed to the name of the company and the plant location.

- Many transactions will have two disposal method codes, one relating to which site the waste was disposed and one indicating the company facility or division from which the waste came.

- A total of 78 codes and descriptions were entered into the disposal method auxiliary file.

4.4 Document Types

Codes and types of documents existing in the document type auxiliary files total 32. This information was entered during the original phase of work.

4.5 Unit Conversions

All of the unit conversions used in the original phase of work were used in the second phase of this compilation.

5.0 RESULTS OF RECORD COMPILATION

The results of the records compilation for the I. J. Recycling sites, as compiled by the contractor are presented in this letter report, appendices to this report and PRPBASE reports.

5.1 PRPBASE Reports

The PRPBASE reports prepared and provided for this records compilation assignment are outlined in this section. The following reports were provided for only the Clinton site to the Primary Contact March 13, 1989:

Waste Transaction Report No. 3, List of Waste Transactions,

Waste Transaction Report No. 7, Ranking of Potentially Responsible Parties by Total Waste Disposed,

Waste Transaction Report No. 8, Ranking of Potentially Responsible Parties by Total Cost of Disposal,

Waste Transaction Report No. 9, List of Transporters from the Transactional Data Base Files,

Waste Transaction Report A, List of Transporters and the Companies They Served,

Letter Tracking Report No. 2, Listing of All Letters with PRP Codes Translated,

Letter Tracking Report No. 3, PRPs Generating Hazardous Waste,

Letter Tracking Report No. 4, PRPs Disposing of Hazardous Waste,

Letter Tracking Report No. 5, PRPs Who Have Not Responded,

Letter Tracking Report No. 6, List of Transporters and the PRPs They Serviced,

Mailing Address Report No. 2, List of Individuals' Addresses, and

Mailing Address Report No. 5, List of Individuals with Incomplete Addresses.

The following transactional data base auxiliary file reports were also provided:

List of Waste Types and Their Codes,

List of Transporters and Their Codes,

List of Disposal Methods and Their Codes,

List of the Types of Documents and Their Codes, and

List of Unit Conversions.

5.2 Highlights of PRPBASE Reports

This section highlights the results of various PRPBASE reports compiled for this site. Highlights include the following:

- Further document review of the site and newly added response documents resulted in identifying 344 PRPs contributing to the various I. J. Recycling sites. The original phase of work resulted in identifying 356 PRPs. The two differ due to the consolidation of company facilities. The site documents identified a total of 5,759 waste transactions.

- Of the 344 PRPs, 275 disposed of waste at the Clinton site. There were 3,942 waste transactions totalling 4.87 million gallons of waste disposed at the I. J. Recycling Clinton site. The total cost of disposal for this waste was approximately $ 1.65 million.

- The largest single contributor to the Clinton site was the combined General Electric facilities, disposing of 704,941 gallons of waste at a cost of $210,287. Their waste accounted for 14.5% of the total.

- Although reports were not provided for the Covington site, 82 PRPs were identified as contributors to this location. A total of 1.33 million gallons of waste was disposed of at this site. One PRP, Container Corporation of America disposed of 27,800 gallons of waste at the Bostick Road Farm location.

6.0 INFORMATION AVAILABLE IN DATA BASE FILES

For this records compilation assignment, four main data base files were used. The data bases included SITE.DBF, INV_SITE.DBF, MAILING.DBF AND LETTER.DBF. These files were further supported by auxiliary file waste descriptions, transporters, disposal methods, documents types and unit conversions. The recommendations/guidelines supplied in the PRPBASE USER'S MANUAL were followed throughout this project. The compilation was supported by EPA Primary Contact guidance and the contractor's general knowledge from similar experiences and projects performed in the past.

APPENDIX A

Document Control Removal and Addition Notes

****

I.J. RECYCLING: QA/QC FILE CHANGES

Removal Note
(Yellow Sheet)

DOCUMENT NOS. _____

Action:

Documents refiled with: _____
(Company Name)

PRP Code: _____

Notes:

Date: _____ Initial: _____

Direction: Put this sheet in original folder and put "addition note" with documents in back of the file documents were moved to.

****

****

I.J. RECYCLING: QA/QC FILE CHANGES

Additions Note
(Green Sheet)

DOCUMENT NOS. _____

Action:

Documents refiled ~~with~~ from: _____
(Company Name)

PRP Code: _____

Notes:

Date: _____ Initial: _____

Direction: Put this sheet on the front of documents which are then placed in back of the new file.

****

APPENDIX B

Waste Transactions Data Coding Form

_ _ _ _ _ _ _ _ S I T E

DATA CODING FORM

Database File: Generator or Site Waste Transactions (Circle one)

1. PRP Code: _ _ _ _ _ _ 2. Invoice Number: _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _
(16 Char)

3. Transaction Date (MM/DD/YY, 01/01/87): _ _ / _ _ / _ _

Waste Data

4. Hazardous? (Y/N): _

5. Description(s): _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

_ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

6. Quantity 7. Unit Size 8. Unit

_ _ _ _ _ _ _ _ _ _ _ . _ _ _ _ _ _ _ _ . _ _ _ _ _

9. Container (15 Characters): _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

10. Container Price: _ _ _ _ _ _ _ . _ _

Document Data

11. Reference Numbers (25 Char): _

12. Type(s) : _ _ _ | _ _ _ | _ _ _ | _ _ _ | _ _ _ |

Shipping Data

13. Transporter(s) : _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

_ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

14. Date Shipped: _ _ / _ _ / _ _ 15. Date Received: _ _ / _ _ / _ _

Purchase Order Data

16. Number(16 char): _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ 17. Date: _ _ / _ _ / _ _

Miscellaneous

18. Disposal Method(s): _ _ _ | _ _ _ | _ _ _ | _ _ _ | _ _ _

19. Comments (80 characters): _

_ _

_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

Coded by Date Entered By Date Page

(Form revised 05/23/88, frmtrwas.ws)

APPENDIX C

First 30 PRPs to Review for Liability Issues

I. J. Recycling Site
Work Assignment No. 33
First 30 PRPs to Review for Liability Issues

American Hoist & Derrick Co.
American Motors General
Ashland Chemical
Borg-Warner
Carter Waste Oil
Commonwealth Oil Corp.
Container Corporation of America
Continental Waste Systems
Dana Corp.
Dayton-Walthers
Ford Motor Co.
Fort Wayne Pools
Franklin Electric
Fruehauf Trailer
General Motors
Hanchar
Hendrickson-Tandem Corp.
International Harvester/Navistar
Magnavox Gov't & Ind. Electronics Co
Northside Sanitary Landfill
Owens Illinois
Queen City Barrel
R. R. Donnelley
Scott & Fetzer Douglas Div.
Taylor Products Div.
Uniroyal
United Technologies Corporation
Wastex
Weatherhead
Williams Paint/Valley American Bank

APPENDIX D

Letter Tracking Data Coding Form

_ _ _ _ _ _ _ _ S I T E

DATA CODING FORM

Database File: Letter Tracking

---

o New Letter Sent (Coded by, date ____________ Entered by, date ____________)

PRP Code: _ _ _ _ _ _

Date Letter Sent (MM/DD/YY, 01/01/87): _ _ / _ _ / _ _

Type of Letter Sent: (N/I) _

Date Followup Letter Sent: _ _ / _ _ / _ _

---

o Letter Received by PRP (Coded by, date ____________ Entered by, date ____________)

Date Letter Received by PRP (MM/DD/YY, 01/01/87): _ _ / _ _ / _ _

Date Followup Letter Received by PRP: _ _ / _ _ / _ _

---

o Response From PRP (Coded by, date ____________ Entered by, date ____________)

Date Response Received from PRP (MM/DD/YY, 01/01/87): _ _ / _ _ / _ _

Summary of Response (210 Characters): _

_ _

_ _

_ _

_ _

_ _

Will PRP participate in a RI/FS? (Y/N) _ A RD/RA? (Y/N) _

Did PRP generate haz. waste? (Y/N) _ Dispose of haz. waste at this site? _

Date range site used: from _ _ / _ _ / _ _ thru _ _ / _ _ / _ _, inclusive

Has PRP included Attachments? (Y/N) _ Insurance info? _ Financial info? _

Has PRP requested CBI? (Y/N) _ Or FOIA? (Y/N) _

Transporters Used by PRP: _ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

_ _ _ _ | _ _ _ _ | _ _ _ _ | _ _ _ _ |

APPENDIX E

FOIA Requests for I. Jones Site Documents

FOIA Requests for I. Jones Site Documents

Allen County Motors
Armstrong Products/Powder Coatings
Group of Morton Thiokol
Appleton Papers
Aqua-Tech
Bristol Corp./Larden Division (BPC)
Chem Central
Colwell General
Conrail
Consolidated Freightways
Cooper Tire & Rubber/Cooper
Industrial Products
Corning Glass Works
Craft Laboratories
Peter Eckrich & Sons
Erie Stone
Food Marketing Corp.
Ford Motor Co.
Fort Wayne Community Schools
Fort Wayne Wire Die
Franklin Electric
GCI, Inc.
General Electric
Gladieux Refinery
Hassan Barrel
Hausman Steel
Hendrickson-Tandem
Heritage Transport/Indiana Liquid Transport
Heritage Environmental Services (HES)
Kunkle Valve
Lassus Bros. Oil
Lincoln National Life
Marathon Oil/Speedway Petroleum
Martin Enterprises
Morrill Motors
Motor Wheel/Goodyear
Moyer Spring
North American Van Lines
Northwest Allen County Schools/
Huntertown School
Owens Corning
Owens Illinois/Brockway Glass
Petrochem
Pines of America
Phillips Petroleum/Sheets Oil
Protective Coatings
Quality Spring
R. R. Donnelly
Rand McNally
Ransburg/CIGNA
Reeves Bros.
Safety-Kleen
Saginaw Medical Center
Taylor Products/Tecumseh
Ulrich Chemical
United Technologies/Essex
VanWaters & Rogers/Univar
Valspar
Zollner Pistons

APPENDIX F

Guidelines for Coding Letter Tracking Response Data

GUIDELINES FOR CODING LETTER TRACKING RESPONSE DATA

DATE LETTER SENT:	The date on the certified mailing receipts
TYPE OF LETTER SENT:	N (106 Administrative Order) or I (104(e) Information Request)
DATE LETTER RECEIVED BY PRP:	The date that appears on the certified green card. If no green card is available or no date appears on a signed green card, enter the date 3 days after the mailing receipt date.
DATE RESPONSE RECEIVED FROM PRP:	Received stamp date on each response.
SUMMARY OF RESPONSE:	Summarize the response, do not use question numbers with yes and no. Give types of waste and types of documents provided (i.e. invoices, manifests, material safety data sheets). List change of ownership or any other pertinent information provided in the response. Abbreviations may be used, however, provide a list of abbreviations and their meanings. Be consistent with the abbreviations.
WILL PRP PARTICIPATE IN A RI/FS? OR RD/RA?	Should be left blank unless the PRP clearly states willingness to participate in a Remedial Investigation Feasibility Study (RI/FS) or a Remedial Design Remedial Action (RD/RA) in their response.
DID PRP GENERATE HAZARDOUS WASTE?	Should be left blank, unless PRP clearly states in their response that hazardous waste was generated.
DID PRP DISPOSE OF HAZARDOUS WASTE AT THIS SITE?	Should be left blank, unless PRP clearly states that disposal of hazardous waste at this site did occur.
DATE RANGE SITE USED:	Should be left blank, unless the PRP clearly states the range or date the site was used.
HAS PRP INCLUDED ATTACHMENTS? INSURANCE INFO? FINANCIAL INFO?	Should have a Y or N which ever is appropriate.
HAS PRP REQUESTED CBI?	Should be N unless the PRP clearly requests that the information provided be treated as Confidential Business Information.
HAS PRP REQUESTED FOIA?	Should be N unless the PRP clearly requests the U.S. EPA provide information even if not stated as "under the Freedom of Information Act".
TRANSPORTERS USED BY PRP:	Use existing transporter codes derived from the site record compilation. Assign new codes as applicable. Use the same codes for all PRP responses.

APPENDIX G

Summary of Responses for PRPs with Liability Issues

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	LIABILITY ISSUE?	DOCUMENTS INCLUDED?	COMMENTS
AMHOIS	AMERICAN HOIST & DERRICK CO.	NO	NO	PRP IS A MEMBER OF CLINTON STREET GROUP. PRP OBJECTS TO THE SHORT TIME PERIOD ASSIGNED BY EPA.
AMMOTO	AMERICAN MOTORS GENERAL	YES	YES	DOCUMENTS ENCLOSED TO SUPPORT RESPONDENT'S DENIAL OF LIABILITY BASED ON FINAL DISPOSAL ELSEWHERE.
ASHLAN	ASHLAND CHEMICAL	NO	YES	THREE TRANSACTIONS WITH MIWN IN 1981 & 1982. TRANSACTION TOOK PLACE WITH CONTINENTAL WASTE SYSTEMS IN 1984. CLAIMS NO KNOWLEDGE OF TRANSPORTING OTHER GENERATOR WASTE TO THE SITE, BUT WILL CONTINUE RESEARCH EFFORTS.
WARNER	BORG-WARNER	NO	NO	RESPONSE BY BORG WARNER ASKS FOR AN EXTENSION OF TIME TO PREPARE RESPONSE.
CARTER	CARTER WASTE OIL			NO RESPONSE. ALL LETTERS WERE RETURNED TO THE EPA.
CONNON	CONNONWEALTH OIL CORP.	NO	YES	NO RESPONSE LETTER. ONLY A FAX TRANSMISSION OF DOCUMENTS PERTAINING TO A PRODUCT SENT TO CWSI. NO LIABILITY ISSUE TO DATE.
CONTAI	CONTAINER CORPORATION OF AMERICAN	YES	NO	DENIES INVOLVEMENT AT SITE AND REQUESTS DELETION FROM PRP LIST. DENY LIABILITY BECAUSE WASTE WAS NON-HAZARDOUS SLUDGE AND THE WASTE WAS DELIVERED PRIOR TO 1982. ALSO ASSERTS NO "IMMINENT AND SUBSTANTIAL ENDANGERMENT EXISTS." SITE DOCUMENTS SUPPORT INVOLVEMENT AT THE SITE.
CWSICL	CONTINENTAL WASTE SYSTEMS			NO RESPONSE.
DACORP	DANA CORP.	NO	NO	LETTER DATED 11/22/88 CONCLUDES THAT THE RESPONSES WILL BE PROVIDED AS SOON AS FACT-GATHERING PROCESS IS COMPLETED. DANA IS A MEMBER OF CLINTON ST. GROUP AND ACTIVELY INVOLVED IN PHASE I CLEANUP AT THE SITE. NO LIABILITY ISSUE TO DATE.
DAYTON	DAYTON-WALTHER	YES	YES	DENY LIABILITY BECAUSE WASTE DISPOSED WAS CLASSIFIED NON-HAZARDOUS.
FORDMO	FORD MOTOR CO.	NO	YES	THREE PLANTS SHIPPED WASTE TO THE SITE AND TWO PLANTS (WIXOM ASSEMBLY & MOUNT CLEMENS PAINT) DID NOT.
FWPOOL	FORT WAYNE POOLS			NO RESPONSE.
FRANKL	FRANKLIN ELECTRIC	YES	YES	FRANKLIN ELECTRIC IS A MEMBER OF THE CLINTON ST. GROUP. THEY BELIEVE LIABILITY MAY BE RELIEVED BECAUSE ALL OF THE WASTE SENT TO MIWN WAS CLASSIFIED NON-HAZARDOUS.
FRUEHA	FRUEHAUF TRAILER			NO RESPONSE.
GENERA	GENERAL MOTORS	NO	YES	GM IS A MEMBER OF THE CLINTON ST. GROUP. GM DOES NOT SEEM TO RAISE A LIABILITY QUESTION. GM DOES ASK THAT DETROIT ALLISON BE INCLUDED WITH GM'S TOTAL BUT ADMIT NO RELATIONSHIP AND RESERVE THE RIGHT TO LATER PROVE THEY SHOULD NOT BE INCLUDED WITH GM.
HANCHA	HANCHAR	YES	NO	ACKNOWLEDGES THAT SALE OF THE SITE DOES NOT RELIEVE HIS COMPANIES OF LEGAL

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	LIABILITY ISSUE?	DOCUMENTS INCLUDED?	COMMENTS
				OBLIGATIONS, BUT FEELS COST CAN BE RECOVERED FROM PURCHASERS.
HENDRI	HENDRICKSON-TANDEM CORP.			COMPANY IS SEARCHING RECORDS AND REQUESTS FOIA.
INTRAV	INTERNATIONAL HARVESTER/NAVISTAR	NO	YES	TRANSPORTED MATERIALS FROM FORMER FORT WAYNE TRUCK ASSEMBLY PLANT TO THE HANCHAR INDUSTRIAL WASTE MANAGEMENT, INC. TRANSPORTED MATERIALS FROM 10/01/80 TO 08/13/82. 113400 GALLONS OF WASTE MATERIAL WENT TO THE SITE.
MAGGOV	MAGNAVOX GOV'T & IND. ELECTRONICS CO		YES	PRP PROVIDES DATES FOR TRANSPORT OF MATERIAL TO SITE, TYPE OF MATERIAL, AND THE SOURCE OR PROCESS THAT GENERATED THE MATERIAL.
NORTHS	NORTHSIDE SANITARY LANDFILL			RESPONSE TO AO STATES THE ORDER IS "ARBITRARY AND CAPRICIOUS, AN ABUSE OF DISCRETION, OR OTHERWISE NOT IN ACCORDANCE WITH LAW". ALSO "THERE IS NO IMMINENT AND SUBSTANTIAL ENDANGERMENT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT" AT THE I.J. SITE.
OWENSI	OWENS ILLINOIS			NO RESPONSE.
QUEENC	QUEEN CITY BARREL			NO RESPONSE LETTER. ONLY A LETTER STATING INTENTION TO PARTICIPATE IN CLINTON ST. GROUP PROVIDED THAT PARTICIPATION DOES NOT CONSTITUTE ADMISSION OF RESPONSIBILITY.
RRDONN	R. R. DONNELLEY	YES	YES	CONSIGNED MATERIALS TO HANCHAR PRIOR TO 02/10/82. CRRI CONDUCTED CLEAN-UP EFFORTS UNDER STATE OF INDIANA OVERSIDE IN 1982. SHOULD NOT BE LIABLE BECAUSE NO WASTE WAS SENT AFTER CLEAN-UP. ADMIT POSSIBLE LIABILITY FOR DRUMS ON SIGHT AFTER CLEAN-UP.
SCOTTF	SCOTT & FETZER DOUGLAS DIV.	YES	NO	QUESTION WHO IS RESPONSIBLE, SCOTT & FETZER OR THE OLD DOUGLAS DIVISION OF THE SCOTT & FETZER CO., (NOW KNOWN AS DOUGLAS COMPONENTS CORPORATION).
TAYLOR	TAYLOR PRODUCTS DIV.			104E WAS RETURNED TO SENDER.
UNIROY	UNIROYAL	YES	YES	RESPONDENT DECLINES TO JUDGE LIABILITY AT THIS TIME AND STATES THAT THE EPA HAS NO AUTHORITY TO REQUIRE RESPONDENT TO DO SO.
UNCORP	UNITED TECHNOLOGIES CORPORATION	YES	YES	ANSWERS FOR UNITED TECHNOLOGIES, UNITED TECHNOLOGIES AUTOMOTIVE, AND ESSEX GROUP. UNITED TECHNOLOGIES DENIES LIABILITY AS IT NEVER DEALT WITH THE ENTITIES OPERATING AT THE SITE. UNITED TECHNOLOGIES AUTOMOTIVE STATES THAT ITS BURLINGTON, IN PLANT MAY NOT BE LIABLE SINCE MATERIAL WAS NON-HAZARDOUS. NO RESPONSE HAS BEEN MADE FOR ESSEX, BUT ANSWERS WILL BE PROVIDED WHEN AVAILABLE.
WASTEX	WASTEX	YES	YES	RESPONDENT STATES THAT ENCLOSED CERTIFICATE OF DISPOSAL MAY POSSIBLY RELIEVE THEM OF LIABILITY. CERTIFICATE INDICATED DISPOSAL AT FONDESSY.
WEATHE	WEATHERHEAD			NO RESPONSE.
WIPAIN	WILLIAMS PAINT/VALLEY AMERICAN BANK	YES	YES	NOVEMBER 13, 1988 LETTER TO MARY GADE SUGGESTS LIABILITY ISSUE. VALLEY NATIONAL BANK PURCHASED STRICTLY ASSETS OF AMERICAN NATIONAL BANK AND "OBLIGATIONS SUCH AS ANY POTENTIAL LIABILITY FOR HAZARDOUS WASTE DISPOSAL NO REFERENCE TO WILLIAMS PAINT IN ANY TEXT OF THE RESPONSE MATERIAL. VALLEY AMERICAN CLAIMS IT IS NOT THE SUCCESSOR INTEREST TO AMERICAN NATIONAL BANK." LETTER FROM BONEWITZ TIES AMERICAN NATIONAL BANK TO

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	LIABILITY ISSUE?	DOCUMENTS INCLUDED?	COMMENTS
				WERE NOT ASSUMED BY VALLEY AMERICAN.*
				WILLIAMS PAINT (ALSO J & O CORPORATION).

01/31/89

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
APPLEP	APPLETON PAPERS, INC.	MATERIALS SENT TO SITE WERE ULTIMATELY DISPOSED OFF-SITE.
BANDYW	BANDY WASTE HAULERS	RECORDS INDICATE PRP DID NOT SELECT THE FACILITY AS THE DESTINATION FOR THE SINGLE SHIPMENT OF WASTE THEY TRANSPORTED. FACILITY WAS SELECTED BY GENERATOR. ACCORDINGLY, PRP IS NOT LIABLE UNDER 42 U.S.C. 9607(a)(4).
BARDMF	BARD MFG.	LETTER FROM CRRI DATED 10/13/82 ASSURES THAT WASTE MATERIALS DISPOSED AT THE SITE DURING CSSI INVOLVEMENT STARTING 6/25/82 WOULD BE PROPERLY DISPOSED.
BIONET	BIONET, INC	RELEASE RESULTED FROM ACT OR OMISSION OF IJ, AS A MATTER OF EQUITY BIONET IS A DEMINIMIS PARTY & SHOULD NOT BE SUBJECT TO JOINT & SEVERAL LIABILITY, NO HAZARDOUS SUBSTANCES GENERATED BY PRP REACHED SITE & RELEASE WAS BEYOND THEIR CONTROL & PARTICIPATION.
BOEHRI	BOEHRINGER MANNHEIM	BECAUSE OF SIGNIFICANTLY SMALL QUANTITIES OF MATERIALS SHIPPED TO THE SITE IN SOLUTION, SHOULD NOT BE HELD LIABLE UNDER PROVISIONS OF 42 U.S.C. SECTION 9607. IF LIABLE, VOLUMETRIC CONTRIBUTION QUALIFIES THEM AS A DEMINIMIS GENERATOR PURSUANT TO CERCLA.
BRUDIS	BRUDI STONE & GRAVEL	NO LIABILITY WITH THIS CLAIM. PRP SOLD SAND TO IJ TO BE USED FOR CONSTRUCTION PURPOSES.
BUCKEY	BUCKEYE PIPELINE	HAS NO REASON TO BELIEVE THAT ANY HAZARDOUS SUBSTANCES WERE SHIPPED TO OR DISPOSED OF AT THE SITE & DOES NOT BELIEVE THERE SHOULD BE ANY LIABILITY UNDER 42 U.S.C. SECTION 9607 WITH RESPECT TO THE SITE. ALL INFORMATION IN RESPONSE SUPPORTS THIS BELIEF.
CARSTE	CARSTEN'S MARATHON, INC.	NOT LIABLE BECAUSE PRP NEVER TOOK MATERIALS TO THE SITE TO BE TREATED, PROCESSED, RECYCLED OR DISPOSED OF BUT ONLY TO BE USED IN OPERATING THE EQUIPMENT OF THE SITE.
CHASEB	CHASE BRASS & COPPER	TRANSACTIONS OF WASTE OIL & SEWAGE SLUDGE WENT ONLY TO HIWN'S CONNETT ADDRESS. THESE WERE NOT DISPOSED AT THE CLINTON SITE, SO PRP SHOULD NOT BE OBLIGATED TO PAY FOR CLEANUP COSTS.
CMSROO	CMS ROOFING (LUPKE-RICE ASSOC. INS.)	NOT LIABLE BECAUSE MATERIAL WAS NOT HAZARDOUS. MANUFACTURER'S SPECIFICATIONS ARE ATTACHED ON MATERIAL SAFETY DATA SHEET TO SUPPORT THIS CLAIM.
COLEWE	COLWELL GENERAL	PRP NOT LIABLE BECAUSE CHEM-SECURITY SYSTEMS, INC CONDUCTED A CLEANUP IN DECEMBER 82 AND PRP'S LAST SHIPMENT WAS AUGUST 81.
CONSOL	CONSOLIDATED FREIGHTWAYS, INC	CONSOLIDATED HAS HAD NO DEALINGS WITH THE SITE. EPA LISTS PRP'S WASTE AS GASOLINE & WASTE OIL WHICH ARE EXCLUDED FROM THE DEFINITION OF HAZARDOUS SUBSTANCES IN 42 U.S.C. SECTION 9601(14).
CONSTR	CONSTRUCTION INC.	NOT LIABLE BECAUSE RESPONDENT WAS A GENERAL CONTRACTOR WHO BUILT A RETENTION WALL, 2 STEEL BUILDINGS & AN UNDERPINNING BUILDING.

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
COUSIN	COUSINS WASTE CONTROL	DO NOT FEEL AS IF THEY, AS A TRANSPORTER, OR ANY OF THE GENERATORS HAULED FOR ARE LIABLE BECAUSE OF THE NON-HAZARDOUS NATURE OF THE MATERIALS. THE SITE WAS OPEN & UNDER SUPERVISION OF THE STATE.
CRINTL	CROWN INTERNATIONAL	NOT LIABLE BECAUSE WASTE DISPOSED WAS NON-HAZARDOUS.
CTSOFB	CTS OF BERNE,INC	SHIPMENTS TRANSPORTED FROM CTS BY HIWN WERE DISPOSED AT OTHER SITES, THEREFORE IT IS NOT CLEAR THAT CTS IS A PRP WITH RESPECT TO THIS SITE.
DAYTOW	DAYTON-WALTHERS	INFORMATION & SUPPORTING DOCUMENTATION INDICATE RESPONDENT NOT LIABLE BECAUSE THEY DID NOT DISPOSE OF "HAZARDOUS SUBSTANCES." MATERIAL IDENTIFIED AS "WASTE WATER & OIL" SPECIFICALLY CHARACTERIZED "NON-HAZARDOUS" NOT REQUIRING AN EPA HAZ. WASTE NUMBER.
DECATU	DECATUR SALVAGE	RECALL THAT THEY WERE NEVER AWARE THEY WOULD OR COULD HAVE BEEN HAULING HAZARDOUS MATERIALS ON BEHALF OF ANYONE TO THE SITE & IN ANY EVENT, SUCH PARTY WOULD HAVE DIRECTED AS TO THE APPROPRIATE FACILITY FOR DELIVERY. NOT LIABLE UNDER 42 U.S.C. SECT 9607.
EPCOPR	EPCO PRODUCTS	SMALL QUANTITY WASTES MANIFESTED TO SITE WERE TO BE NEUTRALIZED & DISPOSED IN ACCORDANCE WITH STATE & FEDERAL REGULATIONS. IF DISPOSED, NONE OF THEIR WASTE REMAINS ONSITE. IF NOT DISPOSED OF PROPERLY, RELEASE CAUSED SOLELY BY CWSI & EPCO IS NOT LIABLE.
ERIEST	ERIE STONE & GRAVEL	WASTE WAS GENERATED BY ADJOINING LANDOWNERS AND SEEPED ONTO ERIE STONE'S PROPERTY. HANCHAR CHOSE THE SITE. PETROLEUM PRODUCTS ARE EXCLUDED FROM THE DEFINITION OF HAZARDOUS WASTES.
EXCELC	EXCEL CORP.	NO RELEASE INTO THE ENVIRONMENT OF MATERIALS IT SENT TO THE SITE OR OF OTHER MATERIALS OF THE TYPE IT SENT TO THE SITE.
EZLIFT	EZ-LIFT SPRING CORP.	PRP ASSUMES WASTE WAS DISPOSED OF.
FEDERA	FEDERAL INSULATION OF INDIANA, INC.	PRP BELIEVES DOCUMENTS PROVIDED (PICKUP RECORD, INVOICE, CANCELLED CHECK, LETTER OF RESPONSE TO EPA) AND OPINION THAT THE MOTOR LUBE OIL SENT TO IJ WAS NOT A HAZARDOUS MATERIAL AND SHOULD INDICATE THEM NOT LIABLE.
FLINTW	FLINT & WALLING	NO REASON TO BELIEVE THAT WASTES WERE NOT DISPOSED OF PROPERLY. IF WASTES WERE NOT DISPOSED BY HIWN, THEN ANY RELEASE OF HAZARDOUS SUBSTANCE WAS CAUSED SOLELY BY THE ACTS OR OMISSIONS OF HIWN'S OWNERS & FLINT EXERCISING DUE CARE, SHOULD NOT BE LIABLE.
FWAIRS	FORT WAYNE AIR SERVICE	INFORMATION PROVIDED CONCERNING VOLUME OF FUEL/WATER MAY PROVE THEM NOT LIABLE.
FWPOOL	FORT WAYNE POOLS, INC	SENT ONLY NON-HAZARDOUS WASTE. ACETONE WAS DISPOSED OFFSITE AT CHEMNET.
FWSTRU	FORT WAYNE STRUCTURAL STEEL	MAY NOT BE LIABLE BECAUSE RESPONDENT HAS NO KNOWLEDGE OR RECORDS OF ITS DELIVERING MATERIALS TO THE SITE.

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
FRANKL	FRANKLIN ELECTRIC	IN 1984, FRANKLIN HIRED OUTSIDE GROUP TO REMOVE FRANKLIN'S HAZARDOUS WASTE FROM THE SITE. REMOVED 105 DRUMS & 11,300 GALS OF SOLUBLE OIL.
GASWAY	GASWAY STATION/GASWAY OIL, INC	MAXIMUM OF 2 TO 5 GALLONS OF GASOLINE TO 1700 GAL OF WATER. THINK THEY SHOULD BE DISMISSED FROM THE ACTION
GLADIE	GLADIEUX REFINERY, INC	NOT A GENERATOR.
GRAVIF	GRAV-I-FLO CORP.	NO INFORMATION TIES DISPOSAL TO THE SITE.
INDIAN	INDIANA & MICHIGAN ELECTRIC CO.	DOUBT WASTE WAS HAZARDOUS.
INTERI	INTERIOR WOODWORKING CORP	ARRANGEMENTS FOR DELIVERY TO THE SITE AND FOR ACCEPTANCE AT THE SITE WERE MADE BY ANOTHER PARTY.
ITTAER	ITT HIGBIE	CHEMICAL ANALYSIS PROVES HAZARDOUS CONDITIONS AT THE SITE COULD NOT HAVE RESULTED FROM PRP'S WASTES.
JACKSO	JACKSON CONSTRUCTION CO.	NO RECORD INDICATES DISPOSAL AT THE SITE.
KGGENE	K.G. GENEINHARDT CO., INC.	NO LIABILITY BECAUSE IT NEVER SENT MATERIALS TO IJ.
KIMMIL	KIM MILLER	MATERIALS WERE TAKEN TO THE SITE PRIOR TO THE DECEMBER 1982 CLEANUP BY CHEM-SECURITY SYSTEMS, INC.
KOONTZ	KOONTZ-WAGNER ELECTRIC CO.	HAVE NOT BEEN ABLE TO DETERMINE THAT THEY ARRANGED FOR DISPOSAL OR TREATMENT AT THE SITE.
KUNKLE	KUNKLE INDUSTRIES	PRP BELIEVES IT IS NOT LIABLE BECAUSE IT HAS NO RECORD OR RECOLLECTION OF SENDING MATERIAL TO THE SITE.
LASSUS	LASSUS BROS	AFTER A GASOLINE SPILL, THE FT. WAYNE FIRE DEPT CALLED HIWN TO CLEANUP. HIWN WAS CALLED WITHOUT KNOWLEDGE OR PERMISSION OF OWNER OF LASSUS BROS.
METALF	METAL FORGE CO.	PRP HAS SEARCHED RECORDS & FOUND NO INFORMATION REGARDING THE SITE.
METROP	METROPOLITAN ENVIRONMENTAL, INC.	RELEASE WAS CAUSED BY ACTS OF HIWN'S OWNERS. CERCLA 107(b)(3)- PRP NOT LIABLE, HAVING EXERCISED DUE CARE & TAKEN ALL PRECAUTIONS.
MEYERS	MEYERS STAMPING & MFG, INC	REFERS TO MATERIAL SAFETY DATA SHEETS & SHIPPING DOCUMENTS THAT INDICATE WASTE IS "PRACTICALLY NON-TOXIC"
MIDLAN	MIDLAND ROSS CORP.	RECORDS DO NOT SHOW TRANSPORT TO THE SITE, SO SHOULD NOT BE LIABLE.
MIDPIP	MIDWEST PIPE & STEEL	BELIEVED IN GOOD FAITH THAT THE TRANSPORTER WAS QUALIFIED TO TRANSPORT & DISPOSE OF MATERIAL.
MIDTOW	MIDWEST TOWEL & LINEN SERVICE	THERE HAS BEEN NO RELEASE INTO THE ENVIRONMENT OF MATERIALS MIDWEST SENT TO THE SITE.

I. J. RECYCLING SITE
WORK ASSIGNMENT NO. 33
SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
NORRIL	NORRILL MOTORS	SHIPMENT WAS PRIOR TO THE DECEMBER 1982 CLEANUP.
NATION	NATIONAL OIL & GAS/GASWAY STATION	WASTE OIL WAS TO BE SALVAGED AND THE WATER WAS TO BE DISPOSED. PRP CONTENDS WATER WAS NOT HAZARDOUS.
NIBCOI	NIBCO, INC	WASTE WAS DISPOSED BEFORE CRRI/CSSI VACATED THE SITE & NIBCO'S INSPECTION REVEALED PROPER WASTE MANAGEMENT.
NORRIS	NORRIS INDUSTRIES	RELEASE WAS DUE TO ACTS OR OMISSIONS OF OPERATORS OF THE SITE.
NOTRED	NOTRE DAME	RECORDS DO NOT INDICATE ANY SHIPMENT TO THE SITE.
OWENSC	OWENS CORNING FIBERGLASS CORP.	WASTE WAS NON-HAZARDOUS.
PARKER	PARKER HANNIFAN CORP.	WASTE WAS REJECTED BY CWSI AND MANIFESTED OFFSITE.
PEABOD	PEABODY ABC CORP.	DEFENSES INCLUDE, BUT ARE NOT LIMITED TO, ACTS OR OMISSIONS OF 3RD PARTY.
PETERE	PETER ECKRICH & SONS	NO KNOWLEDGE OF ANY LINK TO THE SITE.
PETROC	PETROCHEM SERVICES INC.	RELEASE IS DUE TO ACTS OR OMISSIONS OF 3RD PARTY. PETROCHEM EXERCISED DUE CARE.
PHELPS	PHELPS DODGE MAGNET WIRE	ALL PHELPS' MATERIALS WERE REMOVED FROM THE SITE AS OF NOVEMBER 82.
PHSHEE	PHILLIPS PETROLEUM CO.	SOLD PRODUCTS TO SHEETS OIL. DID NOT DISPOSE AT THE SITE.
POTLAT	POTLATCH	BELIEVES WASTES ARE NO LONGER PRESENT AT THE SITE.
PROTEC	PROTECTIVE COATINGS, INC.	MATERIAL WAS NON-HAZARDOUS.
QUEENC	QUEEN CITY BARREL	PORTION OF WASTE WAS SENT TO SYSTECH. A PORTION OF THE WASTE WAS PREVIOUSLY CLEANED UP BY EPA. ORDER DEALS EXTENSIVELY WITH PCB'S. PRP SHOULD NOT BEAR THE COST BECAUSE IT SENT NO PCB'S TO THE SITE.
RRDONN	R.R. DONNELLY & SONS CO.	SENT WASTE PRIOR TO THE 1982 CLEANUP.
RANDNC	RAND MCNALLY CO.	NO INFORMATION INDICATING IT EVER TRANSPORTED WASTE TO THE SITE.
RANSBU	RANSBURG CORP.	CAN FIND NO RECORD THAT IT ARRANGED OR CONTRACTED FOR DISPOSAL OR HAZARDOUS WASTE AT THE SITE.
REAMAG	REA MAGNET WIRE CO.	MATERIAL NOT HAZARDOUS PER CERCLA OR RCRA.
REEVES	REEVES BROS	MATERIALS WERE NOT HAZARDOUS ACCORDING TO O'NEILL v PICILLO 682 F. SUPP. 706 (D.R.I. 1988).
RONSOR	RON SORG CUSTOM SEWER	NOT LIABLE BECAUSE IT HAD NO CONTACT WITH IJ OR ANYONE ELSE REGARDING CONTAMINANTS, POLLUTANTS, OR HAZARDOUS SUBSTANCES.

I. J. RECYCLING SITE
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SUMMARY OF PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
SMOKER	SMOKER-CRAFT, INC.	SHIPMENT WAS PRIOR TO CLEANUP.
SPEEDW	SPEEDWAY PETROLEUM	NO DOCUMENTATION THAT IT EVER TRANSPORTED MATERIALS TO THE SITE.
STURGI	STURGIS IRON & METAL, INC	IF GENERATORS AREN'T LIABLE THEN NEITHER IS STURGIS, THE TRANSPORTER.
STYLEL	STYLELINE	EXPRESSLY DENIES LIABILITY SINCE LIABILITY IS A RESULT OF AN ACT OR OMISSION OF A THIRD PARTY. PURCHASED THE COMPANY AFTER THE ALLEGED DISPOSAL.
SUNOIL	SUN OIL CO.(SUNMARK INDUSTRIES)	NO RECORDS INDICATING INVOLVEMENT WITH IJ, SO COULD NOT BE A LIABLE PARTY.
TLBPLA	TLB PLASTICS	DID NOT GENERATE WASTE, WASTE BELONGED TO PREDECESSOR.
TRITEC	TRITECH MFG.	NOT LIABLE BECAUSE WASTE WAS SENT PRIOR TO THE CLEANUP BY CRRI/CSSI.
ULRICH	ULRICH CHEMICAL	DID NOT SEND HAZARDOUS SUBSTANCES TO THE SITE.
UNTECH	UNITED TECHNOLOGIES CORP.	HUNTINGTON PLANT NOT LIABLE BECAUSE MATERIALS WERE NOT HAZARDOUS.
UNIVER	UNIVERSAL LIVESTOCK EQUIPMENT	DENIES LIABILITY BECAUSE MATERIAL WAS NON-HAZARDOUS.
VALAM2	VALLEY AMERICAN BANK	PRP PURCHASED THE ASSETS OF AMERICAN NATIONAL BANK, DID NOT ASSUME LIABILITIES.
VANWAT	VAN WATERS & ROGERS	WASTE WAS NON-HAZARDOUS, SO NO LIABILITY.
WASTEX	WASTEX RESEARCH INC.	ATTACHED A CERTIFICATION OF DISPOSAL WHICH LISTS ULTIMATE DISPOSAL AT FONDESSY LANDFILL.
WESTVA	WESTVACO - US ENVELOPE	NO EVIDENCE THAT THE FLAMMABLE LIQUID SENT BY PRP CONTRIBUTED TO SITE CONTAMINATION. IS REASONABLE TO ASSUME IT WAS DISPOSED OR DESTROYED IN LAWFUL MANNER.
WILLET	WILLET INTERSTATE SYSTEM	WILLET WAS COMMON CARRIER AND ACTED AT DIRECTION OF 3M.
WILLIA	WILLIAM SHAPIRO	WASTE DISPOSED OF AT IJ WAS PROPERTY OF VALLEY AMERICAN BANK. SHAPIRO NEVER SENT WASTE TO THE SITE.
WIPAIN	WILLIAMS PAINT	NEVER DISPOSED OF MATERIALS AT I JONES SITE.
ZOLLNE	ZOLLNER CORP.	WASTE WAS NOT HAZARDOUS BY OSHA HAZARD COMMUNICATION STANDARD.

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SUMMARY OF ADDITIONAL PRP RESPONSES AND LIABILITY ISSUES

PRPCODE	PRP NAME	COMMENTS
ALBION	ALBION WIRE	ALL WASTE WAS NON-HAZARDOUS. (DOCUMENTS ATTACHED.)
BAUHAN	BAUHAN-HARNISH RUBBER & PLASTICS, INC.	HYDRAULIC FLUID IS NOT HAZARDOUS SUBSTANCE. THE WASTE WAS BURNED & DISPOSED SOMETIME IN 1980.
FINEWI	FINE WIRE, INC.	ALL WASTE WAS NON-HAZARDOUS. (DOCUMENTS ATTACHED.)
MARTIN	MARTIN ENTERPRISES	DID NOT SEND WASTE TO THE SITE. MARTIN INTERNATIONAL, INC. & HOWARD MARTIN, INC. SHIPPED WASTE FROM THE SITE TO WAYNE DISPOSAL.
NATINO	NATIONWIDE INDUSTRIES	WASTE WAS NON-HAZARDOUS.
TOKNEI	TOKNEIN CORP.	WASTE WAS SENT TO BE RECYCLED. ALSO SOME OF THE WASTE SHIPPED WAS NOT HAZARDOUS.